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19 CHICAGO TITLE INSURANCE COMPANY and TICOR
20 TITLE OF NEVADA, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 WELLS FARGO BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00383-KJD-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIRST REQUEST

COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and Ticor Title of Nevada, Inc. (“Ticor Agency”) (collectively “Defendants”) and plaintiff Wells Fargo Bank, National Association (“Wells Fargo”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1 1. On March 5, 2021 Wells Fargo filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;

3 2. On March 7, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. Ticor Agency's response to Wells Fargo's complaint is currently due on April 13,
6 2021, while Chicago Title's response is due on April 15, 2021;

7 4. Counsel for Defendants request a 35-day extension for Chicago Title (37 days for
8 Ticor Agency) through and including Thursday, May 20, 2021 for Defendants to file their
9 respective responses to Wells Fargo's complaint to afford Defendants' counsel additional time to
10 review and respond to Wells Fargo's complaint.

11 5. Counsel for Wells Fargo does not oppose the requested extension;

12 6. This is the first request for an extension made by counsel for Defendants, which is
13 made in good faith and not for the purposes of delay.

14 7. This stipulation is entered into without waiving any of Defendants' objections
15 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Thursday, May 20, 2021.

3 Dated: April 12, 2021

SINCLAIR BRAUN LLP

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5 By: /s/-Kevin S. Sinclair
6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 CHICAGO TITLE INSURANCE COMPANY
9 and TICOR TITLE OF NEVADA, INC.

10 Dated: April 12, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Robbins
12 LINDSAY D. ROBBINS
13 Attorneys for Plaintiff
14 WELLS FARGO BANK, NATIONAL
15 ASSOCIATION

16 **IT IS SO ORDERED.**

17 Dated this 12th day of April, 2021.

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19 ELAYNA J. YOUCHAH
20 UNITED STATES MAGISTRATE JUDGE
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